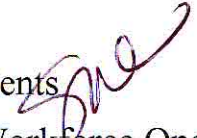


WIAB 13-10

DATE: May 26, 2011
TO: All WIA Subrecipients 
FROM: Susan Simmons, Workforce Operations Manager
Workforce Development Division

SUBJECT: State 15% Projects to Include Internship Activities and Summer Activities

The Workforce Development Council recently set aside \$250,000 of State 15% funds for on-the-job (OJT) training and customized training opportunities to increase business expansion in support of the department's Business Solutions Initiative (SEE WIAB 10-10). Because employers continue to express concern regarding the lack of work readiness, even for those with degrees and certificates, the Department requested the Council authorize the use of these funds for internships in addition to OJTs and customized training. This provides an excellent opportunity for students who have not had the opportunity to gain practical experience in their field of study to gain the work-based skills that will make them more employable. The Executive Committee of the Council approved the use of these funds for internships and the inclusion of Older Youth as eligible participants for the activities supported by these funds. Details regarding expenditure of these funds are outlined below.

Participant Eligibility, Priority for Adults and Older Youth

In addition to supporting OJT and customized training activities for WIA eligible Adults, Older Youth or Dislocated Workers, the State 15% Project may now also be used to support internship activities for WIA eligible Adults, Older Youth and Dislocated Workers. Priority for funds still remains with WIA eligible Adult participants, and now Older Youth participants, where funds are relatively limited when compared to WIA eligible Dislocated Workers who can rely on formula funds, rapid response funds and OJT NEG funds for OJT opportunities. Participants must meet all WIA Adult, Youth or Dislocated Worker eligibility guidelines, *including* a self sufficiency test for employed workers.

Dual Enrollment Required

As with participants enrolled in the project, the State 15% Project will support **only** participant costs associated with the internship ~ participants' wages *and any related supportive services* for the activity. All participants must be dual-enrolled in either the provider's Adult, Youth or Dislocated Worker program, which will support ongoing case management, development of the internship, and any other WIA activities as delineated in the participant's employability plan.

Appropriate Use of State 15% Funds

The State 15% Project may be used to support an internship when other training funds are not available. Since several funding sources are available, please apply the following priority in determining the funding source to be used to support the internship.

FUND USAGE TO SUPPORT INTERNSHIP COSTS, ADULT

1. **WIA ADULT** - Use available regional WIA Adult funds
2. **STATE 15%** - If the region's WIA Adult funds are obligated, use these new State 15% funds

FUND USAGE TO SUPPORT INTERNSHIP COSTS, OLDER YOUTH

1. **WIA YOUTH** - Use available regional WIA Youth funds
2. **STATE 15%** - If the region's WIA Youth funds are obligated, use these new State 15% funds

FUND USAGE TO SUPPORT INTERNSHIP COSTS, DISLOCATED WORKER

1. **WIA DISLOCATED WORKER** - Use available regional WIA Dislocated Worker funds
2. **STATE 15%** - If the region's WIA Dislocated Worker-Rapid Response funds are obligated, use these State 15% funds

Employer Eligibility

The State 15% Project for internship participants allows for internships with private for profit, non-profit and public sector (government) employers. As a reminder, OJT positions, however, are not permitted with public sector (government) employers under the WIA program or the State 15% project.

All WIA provisions and assurances, internship employer/worksites requirements and policies outlined in the WIA Internship Technical Assistance Guide will apply to the State 15% Project.

Reimbursement Guidance and Policies

The following policies have been established for internships costs under the State 15% project. If the case manager believes that individual participant capacity or unique employment opportunities in rural areas should be considered in adjusting these parameters, the case manager should contact the Grants Management Unit to request an individual exception to these policies. Exceptions must be authorized by the Grants Management Unit before incorporation into the Internship agreement.

Duration - Generally, participation in an internship should not exceed 250 (6 weeks) hours unless the case manager documents the rationale for extending the Internship or placing the participant at a different training site. Because of the focus of this project, extended internships of 8 to 10 weeks will be permitted. The length of each internship will be determined by the case manager based on the individual needs of the participant and the ability of the employer to participate in the process to meet those needs. Because of the limitation of funds, these funds will initially be available only during the summer of 2011.

Forms and Management Information System (MIS), Participant File

The State 15% Project will utilize WIA's current Internship forms and employer orientation requirements:

- ~ Internship Memorandum of Agreement (WIA-51)
- ~ Internship Operational Guidelines (WIA-51-A)
- ~ Job Description (WIA-40)
- ~ Employment Plan (WIA-130)
- ~ WIA Weekly Time Report (WIA-50)
- ~ W-4
- ~ INS Form I-9

Each participant must be dual-enrolled in the State 15% project **and** either the Adult program (Title X), the Youth program (Title Y) or the Dislocated Worker program (Title Z). The WIA MIS has been updated and reflects the option for the State 15% Project ~ **Title S, Project Code 837**.

Federal regulations require that individuals in training supported with State 15% funds must be included in performance reporting. Dual-enrollment in the Adult, Youth or Dislocated Worker program will ensure compliance with this regulation.

As with any other dual- enrollment, only one participant file containing only one set of eligibility documents, one set of assessment documents, one set of Internship documents, etc., will be maintained by the case manager.

Additional Budget Information

To allow expenditure of funds as quickly and expeditiously as possible, the State 15% Project program will be managed on a statewide basis; there will be no regional allocations because of the limited amount of funds available throughout the state. Case management staff can assist in the tracking process by going to the following link:

<http://srvsps07/wia/Updates/State%2015%20OJTInternship%20Tracking/Forms/AllItems.aspx>

Open the attached tracking spreadsheet, titled *State 15 percent customized OJT-Internship tracking*, and complete each field for the participants they have enrolled in either OJT or Internship activities under this project. This spreadsheet will help to provide Central Office staff a “real time” snapshot of what this project’s obligations are prior to MIS entry. Central Office staff will continuously monitor enrollments and obligations who, along with Grants Management staff, will apprise service delivery staff of project status on a regular basis.

Please contact your Grants Management staff if you have any questions.